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Via ECF

Honorable Brian R. Martinotti
United States District Court Judge
Martin Luther King Building & Courthouse
50 Walnut Street, Newark, NJ, 0701

In Re Application of Daniel Snyder For An Order Directing Discovery From Verizon Communications, Inc. Pursuant to 28 U.S.C. 1782, Civil Action No.: 2:21-cv-00819-BRM-ESK

Dear Judge Martinotti:

We are counsel to non-parties and proposed intervenors Mr. John A. Moag Jr. and Moag & Co. LLC, on their motion to intervene in this case (ECF 3). In response to Mr. Snyder's letter of February 8, 2021 (ECF 5), we write to advise the Court that our clients are currently in the process of complying with Judge Hollander's Order attached as Exhibit 1 to Mr. Snyder's letter (see ECF 5.1). We further note that, while the Moag supplemental production in Maryland may resolve or moot most of the issues before this Court on our motion to Intervene, we believe our motion should nevertheless be granted to ensure that we are able, if and as needed, to assert any privileges or other matters necessary in order protect our clients' interests in the subpoenaed documents.

Respectfully submitted,

GREENBERG TRAURIG, LLP

By: **s/ Roger B. Kaplan**

Roger B. Kaplan

*Attorneys for Movants and Proposed
Intervenors Mr. John A. Moag, Jr. and
Moag & Co. LLC*

cc: Counsel of Record (via ECF)

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